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6/20/05

GROUP

MACKENZIE

June 20, 2005

Schnitzer Investment Corporation
Attention: Ann Gardner
PO Box 10047
Portland, OR 97296-0047

Re: **Nature in Neighborhoods**
Impacts on Crawford Street Site
Project Number 2030197.02

Dear Ann:

As requested, we have examined the potential effects of Metro's Goal 5/Title 13 Nature in Neighborhoods Model Code on Schnitzer Investment's Crawford Street site. Enclosed with this letter is a map that depicts the site; top of bank (heavy dashed brown line); area riverward of top of bank; 25-foot and 50-foot greenway buffers; and Goal 5 Allow, Low, Moderate and High HCA's.

4 Zone

Currently, Greenway regulations restrict the extent of the development riverward of top of bank and up to 50 feet from top of bank. As you can see, Goal 5 Low and Allow HCA's impact areas of the site outside those areas currently regulated by the Greenway setbacks. Impacts may occur within the Allow HCA's without mitigation; however, areas identified as Low will require mitigation if impacted.

The mitigation can be provided in two forms: (1) based on the number and size of trees removed from the site, or (2) by providing a number of trees and shrubs per 500 square feet of impact area. It is important to note that the Model Code requires mitigation to be provided under the Option that requires the greatest amount of trees. However, for the purposes of this evaluation it is difficult to determine the caliper of trees that would be removed on site under Option 1. As such, this evaluation utilizes Option 2.

Our calculations indicate that there are 1.56 acres of Low HCA on the site. After subtracting out the .25 acres that are riverward of the top of bank, .1 acres within the 25-foot setback, and .53 acres within the 50-foot setback, there are .68 acres (29,621 square feet) of Low HCA that could be impacted if mitigation is performed.

Previously, we evaluated Metro's COO Recommended version of the Model Code. On May 12, 2005, the Metro Council revised the Model Code, reducing the amount of impact in a Low HCA to 50% and increasing the tree and shrub mitigation requirements under Mitigation Option 2 for the Clear and Objective standards. The Council also directed staff to work with a small advisory group to evaluate and further refine the model code, including the planting standards.

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For this particular site, the 50% impact limitation for Clear and Objective does not affect your development. This is due to the existing Greenway development restrictions, which results in less than 50% of the Low HCA (.68 acres) that could be impacted, with mitigation. (It should be noted that this could have an impact on other sites that do not have current restrictions).

However, the planting standards for Option 2 are in flux. The following identifies the difference in each, for Option 2.

Version	Trees	Shrubs	Caliper of Trees	Spacing
COO Recommended Version	3 per 500 SF of impact	4 per 500 SF of impact	1"	No direction
Metro Council Version	8 per 500 SF of impact	36 per 500 SF of impact	1"	No direction
Advisory Group 6/17/05 Version	5 per 500 SF of impact	75 per 500 SF of impact	1 1/2"	10 feet o.c.



The number of trees and shrubs required per 500 SF affects the amount of mitigation required. With 29,621 SF of Low HCA (non greenway) viable for impact, 59 units of trees and shrubs are required per 500 SF of impact. Previously, there was no direction on planting spacing, as such, our prior letter assumed a spacing of 20' o.c. for the trees. However, as indicated above, the Advisory Group is considering a 10' o.c. spacing requirement, which equates to 400 SF per 9 trees. The following calculates the difference in trees and shrubs required under each version, and the mitigation SF required based on a 10' o.c. spacing of trees.

- 20' o.c.*
COO

COO Recommended Version – 3 trees and 4 shrubs per 500 SF
 $(59 \times 3 \text{ trees}) + (59 \times 4 \text{ shrubs}) = 177 \text{ trees} + 236 \text{ shrubs}$
 $177 \text{ trees} / 9 = 19.6 \times 400 \text{ SF} = 7,867 \text{ SF}$
1600
- 20' o.c.*

Metro Council Version – 8 trees and 36 shrubs per 500 SF
 $(59 \times 8 \text{ trees}) + (59 \times 36 \text{ shrubs}) = 472 \text{ trees} + 2,124 \text{ shrubs}$
 $472 \text{ trees} / 9 = 52.4 \times 400 \text{ SF} = 20,960 \text{ SF}$
1600
- 20' o.c.*

Advisory Group 6/17/05 Version – 5 trees and 15 shrubs per 500 SF
 $(59 \times 5 \text{ trees}) + (59 \times 15 \text{ shrubs}) = 295 \text{ trees} + 885 \text{ shrubs}$
 $295 \text{ trees} / 9 = 32.8 \times 400 \text{ SF} = 12,120 \text{ SF}$
1600

all 10' o.c.

*if 20' o.c.
then larger*

*small advisory th.
month
back to Chris from.*

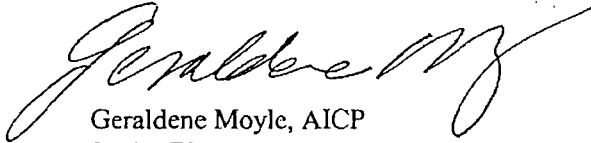
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Note that the Model Code requires mitigation for impacts to the Low HCA to occur on site. While mitigation plantings may be provided throughout the site, the volume of trees required will require some additional landscape areas that one would not anticipate with commercial or industrial development.

Again, the above assumes that the entire Low HCA that is outside the 50-foot Greenway setback is desired to be developed. It also assumes Option 2 is selected as a mitigation option. The above further assumes that all mitigation takes place on site and that trees are planted 10 feet on center. Changes to these assumptions (i.e., incorporation of some required trees within development plan, wider or narrower spacing of trees, etc.) would alter these calculations.

If you have any questions, or would like us to examine additional development scenarios or assumptions, please feel free to contact me.

Sincerely,



Geraldene Moyle, AICP
Senior Planner

GEM/mpd

Enclosures: Schnitzer Crawford Street Site Nature in Neighborhoods HCA Map

c: Tom Wright, Catie Fernandez – Group Mackenzie